

Message

From: Cerise, Kathy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3CCF3F66D09943FE914BE271FC992084-HERNANDEZ, KATHRYN]
Sent: 6/7/2019 8:01:27 PM
To: McInerney, Lucy (ECY) [LPEB461@ECY.WA.GOV]
CC: Moore, Susan/SEA [Susan.Moore@jacobs.com]
Subject: RE: cPAH's risk-based values//FW: Quendall Proposed Plans

Hi Lucy,

Below is a brief summary. Hopefully you were given our previous correspondence. Attendees are myself, Shawn Blocker, Elizabeth Allen, Susan Moore (contractor) and Lon Kissinger.

PRG of 1.62 mg/kg for subsistence fish/shellfish consumer:

Muckleshoots had no consumption rates. It was agreed that a US Per Capita subsistence fish/shellfish consumption rate would be used = 143.4 grams/day. Muckleshoot's did not want to adopt another tribe's number (big deal, precedent-setting).

We didn't use the 2007 Tribal Framework because we are not using tribal consumption rates. For fish/shellfish consumption, the subsistence consumer scenario did not include early life exposures for cPAHs (consistent with the RI). The inclusion of early life exposures for cPAHs requires reliable knowledge of child consumption rates for fish/shellfish, which were not available. This is supported by text in the 2007 Tribal Framework: The two studies that EPA 2007 used as sources for Tribal adult consumption rates also surveyed children's fish and shellfish consumption.

When adequate Tribal-specific studies for children's consumption rates are unavailable, other options may be considered to estimate Tribal child fish and shellfish consumption rates in Puget Sound and the Strait of Georgia. Four are presented here without implying or recommending a preference : the 4 options are listed on pp.10-11 of the document]. Other approaches also may be proposed for consideration. **The decision as to how best to estimate child consumption rates should be considered on a site-specific basis and in consultation with Tribes.**

PRG of 0.98 mg/kg for beach user:

For sediment contact (aka beach user scenario), early life exposures for cPAHs were included into the risk/PRG estimates, incorporating the child and adult exposure assumptions, consistent with the RI (Table 7.1-5 of the 2012 Final RI Report).

Kathryn Cerise
Region 10 Remedial Project Manager
1200 6th Ave,
Seattle, WA 98101
Mail Code: 12 D12 1
Phone: 206-553-2589

From: McInerney, Lucy (ECY) <LPEB461@ECY.WA.GOV>
Sent: Friday, June 07, 2019 10:40 AM
To: Cerise, Kathy <Cerise.Kathryn@epa.gov>
Subject: RE: cPAH's risk-based values//FW: Quendall Proposed Plans

Hi Kathy, per my voice-mail, I'm now the designated Quendall contact for Ecology Personal Privacy / Ex. 6 I've also taken over project management of Ching-Pi's Gas Works Park and Barbee Mill MTCA sites.

Since I'm new to the Quendall project, would it be possible for EPA to provide the status of the Operable Unit 2 Proposed Plan, and a brief overview of the evolution of PRGs for cPAHs in sediment since the December 18 Proposed Plan for Public Comment document? Providing this context at the beginning of our June 19 meeting would be very helpful.

Also, please confirm who will attend the meeting for EPA. For Ecology it will be Priscilla Tomlinson, Chance Asher and myself.

Thank you. I look forward to meeting you on June 19.

Lucy

Lucille T. McInerney, P.E. | Cleanup Project Manager
Washington State Department of Ecology
Northwest Regional Office | Toxics Cleanup Program
3190 160th Avenue SE, Bellevue, WA 98008-5452
425-649-7272 | lucy.mcinerney@ecy.wa.gov



From: Wang, Ching-Pi (ECY) <CWAN461@ECY.WA.GOV>
Sent: Thursday, May 16, 2019 10:54 AM
To: Cerise, Kathy <Cerise.Kathryn@epa.gov>
Cc: Tomlinson, Priscilla (ECY) <PTOM461@ECY.WA.GOV>; Asher, Chance (ECY) <CASH461@ECY.WA.GOV>; McInerney, Lucy (ECY) <LPEB461@ECY.WA.GOV>
Subject: cPAH's risk-based values//FW: Quendall Proposed Plans

Dear Kathy:

First my apologies for a 6-weeks delayed response to your email below.

Ecology would like to meet with you and Lon Kissinger, and any other EPA colleagues, to discuss ramifications of establishing cPAH risk-based values.

We would like to share our concerns regarding values based on early life exposure using child fish consumption rates. For example, topics we would need to discuss are:

- 1) Incorporating early life exposure for the fish consumption exposure pathway per EPA policy.
- 2) Use of a subsistence fisher consumption rate (e.g., tribal) per EPA policy.
- 3) Ramifications to establishing different cPAH cleanup levels for GasWorks Park, Quendall Terminals, and the Lake Washington and Lake Union.

These topics are very important to Ecology and we want to share our point of view.

An in-person meeting is preferred over a telephone conference call. We would be happy to come to your office in Seattle.

Please provide dates and times for a 2-hour meeting at your convenience. We will accommodate accordingly.

Sincerely,

Ching-Pi
425.649.7134.

From: Cerise, Kathy [mailto:Cerise.Kathryn@epa.gov]

Sent: Friday, March 29, 2019 1:00 PM

To: Wang, Ching-Pi (ECY) <CWAN461@ECY.WA.GOV>

Cc: rwar462@ECY.WA.GOV; Blocker, Shawn <Blocker.Shawn@epa.gov>; Grandinetti, Cami <Grandinetti.Cami@epa.gov>

Subject: Quendall Proposed Plans

Ching-Pi,

Regarding the PRG of 1.62 mg/kg for subsistence fish/shellfish consumer and incorporation of early life exposure assumptions: For fish/shellfish consumption, the subsistence consumer scenario did not include early life exposures for cPAHs (consistent with the RI). The inclusion of early life exposures for cPAHs requires reliable knowledge of child consumption rates for fish/shellfish, which are not available.

Regarding the question on use of 2007 Tribal Framework: EPA consulted with the Muckleshoots regarding use of the Tulalip consumption rate during the RI phase and was asked **not** to use it. We have provided the current Proposed Plan to the Muckleshoot and received no comments; if in the future the Muckleshoot Tribe decides that a proxy is necessary, EPA would strongly consider a ROD amendment or ESD to satisfy our Tribal Trust responsibilities.

Regarding the PRG of 0.98 mg/kg for beach user and incorporation of early life exposure assumptions: Early life exposures for cPAHs were included into the risk/PRG estimates, incorporating the child and adult exposure assumptions, consistent with the RI (Table 7.1-5 of the 2012 Final RI Report). We did compare our number to Ecology's existing number to demonstrate it was in the ballpark.

Please let me know if you have any further questions or concerns.

Thank you,

Kathryn Cerise
UCR RPM